

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

Plaintiff,

v.

VINCENTE VILLALOBOS-RODRIGUEZ,

Defendant.

Criminal Action No. 07- 58

REDACTED

INDICTMENT

The Grand Jury for the District of Delaware charges that:

Count 1

On or about April 14, 2004, in the District of Arizona, Vincente Villalobos-Rodriguez, the defendant, an alien and subject of Mexico, did knowingly enter the United States from Mexico at a point near Douglas, Arizona, which said time and place was then and there other than as designed by immigration officials of the United States for the entrance of immigrants into the United States, and on or about April 16, 2007, the defendant was apprehended in the District of Delaware, in violation of Title 8, United States Code, Section 1325(a)(1) and 1329.

Count 2

On or about August 23, 2004, in the District of Delaware, Vincente Villalobos-Rodriguez, the defendant, falsely and willfully represented himself to be a citizen of the United States when applying for a job and submitting an Immigration Form I-9, in violation of Title 18, United States Code, Section 911.

Count 3

On or about August 23, 2004, in the District of Delaware, Vincente Villalobos-Rodriguez, the defendant, did knowingly use, without lawful authority, a means of identification, that is, a name and a social security number, of another person during and in relation to a violation of the false claim to citizenship statute, 18 U.S.C. § 911, all in violation of Title 18, United States Code, Section 1028A(1).

Count 4

On or about August 23, 2004, in the District of Delaware, Vincente Villalobos-Rodriguez, the defendant, knowingly did possess, utter, and use a social security card, a document proscribed by statute and regulation as evidence of authorized employment in the United States, knowing the document was unlawfully obtained, in violation of Title 18, United States Code, Section 1546(a).

Count 5

On or about August 23, 2004, in the District of Delaware, Vincente Villalobos-Rodriguez, the defendant, knowingly did possess, utter, and use a social security card, and a State of Ohio identification card, neither document lawfully issued to the defendant, with the intent that such documents be used to defraud the United States Bureau of Immigration and Customs Enforcement, an agency of the United States, in violation of Title 18, United States Code, Section 1028(a)(4).

Count 6

On or about August 23, 2004, in the District of Delaware, Vincente Villalobos-Rodriguez, the defendant, willfully and knowingly, and with intent to obtain employment by deception, did falsely represent that a particular social security account number had been assigned to him by the Social

Security Administration, when, in fact, the defendant knew the social security number had not been assigned to him, in violation of Title 42, United States Code, Section 408(a)(7)(B).

A TRUE BILL:

Foreperson

COLM E. CONNOLLY
United States Attorney

By 

Edmond Falgowski
Assistant United States Attorney

Dated: 4-24-07